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March 25, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street
Room 222
Washington, D.C. 20554

Re: Ex-Parte Presentation
Amendment of the Commission's Rules to Establish
New Personal Communications Services, GEN Docket No.
90-314; ET Docket No. 92-100; Redevelopment of
Spectrum to Encourage Innovation in the Use of New
Telecommunications Technologies, ET Docket
No. 92-9.

Dear Ms. Searcy:

In accordance with Section 1.1206(a)(2) of the Commission's Rules, 47 C.F.R. § 1.1206(a)(2) (1991), this is to notify the Commission that on March 24-25, 1993, Sandy Abramson of AT&T, Stuart Overby of Motorola, Steven Sivitz of Rolm and R. Michael Senkowski of Wiley, Rein and Fielding, representatives of the Unlicensed PCS Ad Hoc Committee for 2 GHz Microwave Transition and Management, met with Robert M. Pepper, Chief, Office of Plans and Policy; Stevenson S. Kaminer, Legal Advisor, Office of Commissioner Sherrie P. Marshall; Linda L. Oliver, Legal Advisor, Office of Commissioner Ervin S. Duggan; Byron F. Marchant, Legal Advisor, Office of Commissioner Andrew C. Barrett; Ralph A. Haller, Chief, Private Radio Bureau; Thomas P. Stanley, Chief Engineer, Office of Engineering and Technology; Brian F. Fontes, Acting Chief of Staff, Office of James H. Quello; and Kathleen Q. Abernathy, Legal Advisor, Office of James H. Quello.

The purpose of these meetings was to discuss issues related to the deployment of unlicensed Personal Communications Services. Attached is a summary of the presentation to these Commission officials.

Should you have any questions regarding this matter,
please call me at (202) 429-7249.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "R. Michael Senkowski".

R. Michael Senkowski

Encl.

cc: Robert M. Pepper
Stevenson S. Kaminer
Linda L. Oliver
Byron F. Marchant
Ralph A. Haller
Thomas P. Stanley
Brian F. Fontes
Kathleen Q. Abernathy

UNLICENSED PERSONAL COMMUNICATIONS SERVICES: STEPS TO MAKING DEPLOYMENT A REALITY

Unlicensed PCS Can Bring Enormous Benefits to the Public and the Country. The FCC has proposed allocating spectrum for important new unlicensed PCS offerings. This FCC contribution to improving the nation's telecommunications infrastructure is significant in several major respects:

- **Unlicensed PCS consists of wireless data, voice and messaging systems and devices operating at low power with high portability. Portable units may talk directly to other portable units or through a site located system. Unlike licensed PCS, which is focused on wide area service, Unlicensed PCS fills the void for "on site" or campus wide service. With the need for licensing removed, prospective buyers will be able to purchase equipment with ease, convenience.**

- The Unlicensed PCS industry must assume responsibility for managing the relocation process, satisfying microwave licensee concerns, and resolving any disputes.
- A system of ensuring equitable Unlicensed PCS industry participation in the funding and management of these challenges is necessary.

An Open Industry Entity Will Be Necessary for Implementation of Unlicensed PCS. As a result of extensive meetings among prospective suppliers of unlicensed systems and devices, UTAM has reached consensus that participation of all suppliers of unlicensed PCS equipment in an open industry entity is needed to assume relocation and spectrum management functions. The Unlicensed PCS entity should be formed consistent with the following principles:

1. Ultimately, there is a requirement for clear spectrum for the viable deployment of Unlicensed PCS, i.e. unlicensed roaming devices.
2. There is a requirement for a mechanism to clear the spectrum for Unlicensed PCS.
3. The clearing mechanism should include an industry entity. The entity would negotiate with incumbents, collect funds from manufacturers, and disperse funds for the move.
4. In order to facilitate the early introduction of Unlicensed PCS, relocation of the 2 GHz microwave incumbents should commence immediately and be concluded as rapidly as possible.
5. Problematic 2 GHz links should have priority access to the Federal Government spectrum at 1710 to 1850 MHz.

Participants in the Unlicensed PCS Ad Hoc Committee for 2 GHz Microwave Transition and Management:¹

Companies

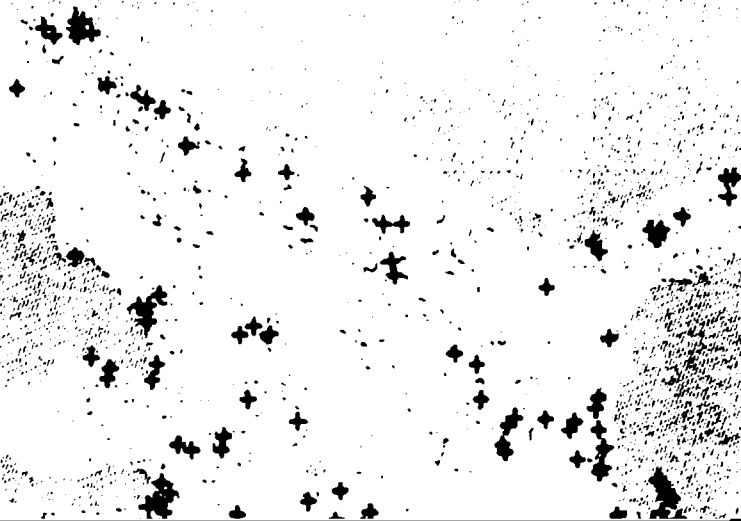
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Ericsson
Intel
LCC Incorporated
Locate
Metrocall
Motorola
Northern Telecom
Omnipoint
Rolm
Rose Communications
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Sprint
Telesciences
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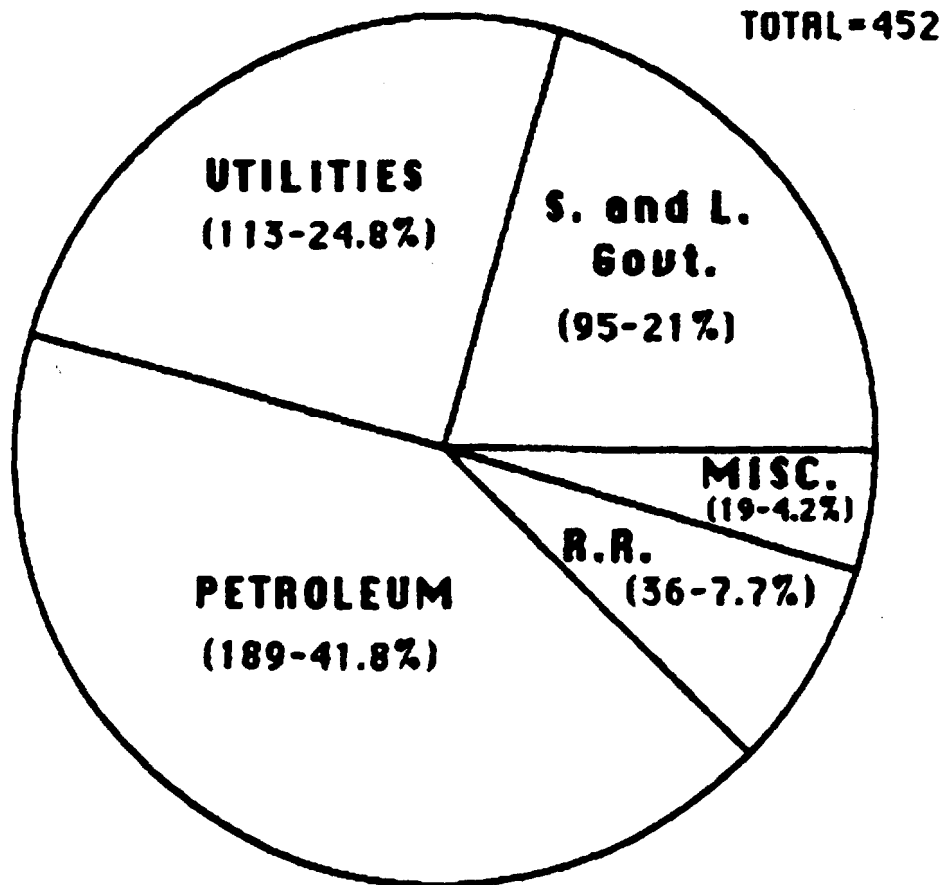
¹ The attached proposal represents the consensus views of the Committee and should not be ascribed to any individual member.

Figure 1 1910-1930 Mhz



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**MICROWAVE LINKS
BY TYPE
(1910-1930MHZ)
(U.S.)**



MOTOROLA 11/92